

**REMARKS**

With entry of this amendment, claims 16-26 and 29-32 and remain pending. Independent claim 16 has been amended to include all of the limitations of former dependent claims 39-41, and is believed to be in condition for allowance, per paragraph 12 of the Office Action. Claims 17-26 and 28 depend from claim 16, and are now in condition for allowance for at least the same reason. Claim 29 has been amended to more particularly point out what the Applicants regard as the invention and distinguish from the cited reference. Claims 30-32 and 42 have been amended to more specifically depend on the "system" of claim 29, but are otherwise unchanged. No new matter has been added.

Claims 29-32 Rejected over Morgan et al. (2003/0076281)

Claims 29-32 stand rejected under 35 U.S.C. §103(a) unpatentable over published patent application 20030076281 ("Morgan et al.").

Although Morgan et al. early on (paragraph 0020) states that an "LED system" may refer to "a single light emitting diode having multiple semiconductor dies that are individually controlled," it is clear from the publication as a whole that any reference made to positioning lenses over an LED refers to positioning lenses over the entire "LED system", not over individual dies in a single package or on a single substrate. Further, there is no indication or teaching that an "LED system" may include at least two individual LED dies, each being separately controllable, attached side-by-side to a common substrate within a 4 mm diameter.

By way of example, in transition paragraph 0259 of Morgan et al., there is an introduction made regarding positioning lenses over LEDs (more particularly described in paragraphs 0260 through 0273), referring to "*typical* LEDs" (end of paragraph 0259) that are well-known encapsulated LEDs. While there may be more than one die inside the encapsulated LED, the

lenses are positioned on top of the whole LED, not the individual dies in Morgan. No such closely space arrangement as recited in claim 29 is disclosed or described in Morgan et al.

The substrate that the examiner points to in figure 107:1001 is clearly showing typical LEDs or LED systems, not individual, closely spaced dies. In fact, they are illustrated as being rounded, just like "typical" LEDs, and not cubic like individual LED semiconductor dies. Further, the lenses in the LED array of claim 29 will spread or concentrate (collect) the light from the underlying individual dies, whereas Morgan describes using diffusion, which is more akin to jumbling the light into all directions with the use of a rough surface.


For at least these reason, it is respectfully submitted that independent claim 29, along with dependent claims 30-32 and 42 are patentable over Morgan et al., and withdrawal of the §103 rejection is respectfully requested.

### CONCLUSION

In view of the forgoing claim amendments and remarks, the existing rejections are believed to be overcome, and a Notice of Allowance is respectfully requested. The Examiner is invited to call the undersigned with any questions regarding this paper or the application generally.

Respectfully submitted,  
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Dated: November 13, 2007

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